



**VIRGINIA
& AMBINDER LLP**
Attorneys at Law

40 Broad Street, 7th Floor
New York, NY 10004
Telephone: (212) 943-9080


Maura Moosnick
Associate
mmoosnick@vandallp.com

January 31, 2023

VIA ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED**

1/31/23 
John G. Koeltl, U.S.D.J.

Re: **Trustees of the New York City District Council of
Carpenters Pension Fund, et al. v. NASDI, LLC, 20 CV 7055(AJN)**

Dear Judge Koeltl:

This firm represents the Petitioners in the above referenced matter. I write jointly with the Counsel for Respondent NASDI, LLC ("Respondent") to request that the Court extend the stay of this action previously entered December 5, 2022 (*see* Dkt. 37) by ninety (90) days. This is the first such request for an extension of the instant stay.

Petitioners and Respondent have been engaged in productive settlement discussions and have reached a tentative agreement. The terms of any settlement will be subject to formal approval by a vote of the Fund Trustees at their meeting on April 12, 2023.

Accordingly, the parties request that this Court extend the stay of this action by ninety (90) days in order to allow the parties to finalize the proposed terms of settlement, present any such proposed settlement to the Trustees for approval, and finalize the written form of settlement depending upon the Trustees' decision. We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/Maura Moosnick
Maura Moosnick, Esq.
Attorney for Petitioners

/s/Adam D. Cole
Adam D. Cole, Esq.
Attorney for Respondent